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January 15, 2016

Via ECF

Hon. Jose L. Linares, U.S.D.J.
United States District Court
Martin Luther King Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *Sun v. Han*
Civil Action No. 15-0703 (JLL) (JAD)

Dear Judge Linares:

This firm, along with our co-counsel Glancy Prongay & Murray LLP, serves as co-lead counsel for the Plaintiffs and the Class. In connection with my discussion with Your Honor's law clerk this morning, we write in response to the Clerk's Notice of Call for Dismissal Pursuant to Rule 4(m) to advise the Court of our efforts to serve Daqing Han and Xiaoli Yu, Telestone Technologies Corporation's Chief Executive Officer and Chief Financial Officer during most of the Class Period.

As the Court is aware from the Motion to Dismiss briefing and as indicated in the operative Complaint, this action involves a number of foreign defendants and a foreign company that is no longer listed or conducting business in the United States. Pursuant to Rule 4, Plaintiffs are attempting to carry out service of process on certain of the individual defendants using internationally agreed means as provided in the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil and Commercial Matters and consistent with the applicable rules for service under the laws of China. Plaintiffs have already located certain of the individual defendants and are having the Complaint and Summons translated by a certified translator. Once the document has been translated, Plaintiffs will pursue service in China of Daqing Han and Xiaoli Yu.

After careful consideration of the case and in light of the complexities of effectuating proper service of process upon the remaining foreign defendants, Plaintiffs have decided that pursuing service of Telestone Technologies Corporation, Hong Li, Ming Li, Lian Zhu,

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Guanghai Cheng, Guobin Pan, Yuanpin He, Mazars Scrl and Weizermazars LLP will delay the case while providing minimal, if any, benefit to the Class. Accordingly, the claims against these defendants may be dismissed without prejudice by the Court. Additionally, the Complaint did not name Bruce Zurbrick, who was a lead plaintiff movant, as a defendant.

For all the foregoing reasons, we respectfully submit that there is good cause to cancel the in-person conference scheduled on January 19 at 10:00 am by the Notice of Call for Dismissal and to allow Plaintiffs to pursue foreign service upon Daqing Han and Xiaoli Yu.

Thank you for your continued attention to this matter. If the Court has any questions, we are available at your convenience.

Respectfully submitted,

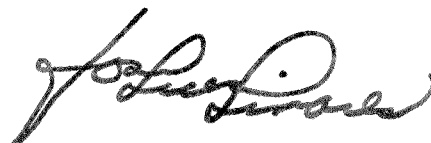
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James E. Cecchi

JAMES E. CECCHI

cc: All Counsel (via ECF)

All claims against defendants Telestone Technologies Services, Hong Li, Ming Li, Lian Zhu, Guanghui Cheng, Guobin Pan, Yuanpin He, Mazars Scrl and Weizermazars LLP are hereby dismissed without prejudice. The clerk's office is hereby directed to terminate the aforementioned defendants. IT IS SO ORDERED


January 19, 2016